IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : BANKRUPTCY CASE NO. 16-11100-TPA

:

Milford Eugene Rimer III and :

Connie Lynn Rimer, : CHAPTER 13

Debtor,

_____ : RELATED TO DOCKET NO.: 112

Connie Lynn Rimer,

Movant, : HEARING DATE AND TIME: : March 24, 2021 at 10:30 AM

:

vs. :

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Ford Motor Credit Company,

:

:

:

Ronda J. Winnecour, Esquire,

And

Chapter 13 Trustee, Respondents.

NOTICE OF HEARING WITH RESPONSE DEADLINE ON DEBTOR'S MOTION TO AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR

TO THE RESPONDENTS:

You are hereby notified that the above Movant seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant's response to the motion no later than <u>March 13, 2021</u>, i.e., seventeen (17) days after the date of service below, in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at <u>www.pawb.uscourts.gov</u>. If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A Zoom Video Conference Hearing will be held on March 24, 2021 at 10:30 AM, before Judge Thomas P. Agresti via the Zoom Video Conference Application ("Zoom"). To participate in and join a Zoom Hearing please initiate and use the following link at least 15 minutes prior to the scheduled Zoom Hearing time: https://www.zoomgov.com/j/16021303488, or alternatively, you may use the following: Meeting ID: 160 2130 3488. For questions regarding the connection, contact Judge Agresti's Staff Lawyer, Atty. Courtney Neer, at 814-464-9781. All attorneys and Parties may only appear by Zoom and must comply with Judge Agresti's Amended Notice of Temporary Modification of Appearance Procedures, dated and

effective June 10, 2020, which found the Court's website can be on https://www.pawb.uscourts.gov/sites/ default/files/pdfs/tpa-proc-appearances.pdf. Under the current COVID-19 circumstances, the general public may appear telephonically if unable to do so via the Internet. When the need to appear telephonically arises members of the general public should immediately contact Staff Attorney Courtney Neer to make telephonic arrangements. Only ten minutes is being provided on the calendar. No witnesses will be heard. If an evidentiary hearing is required, it will be scheduled by the Court for a later date.

Date: February 24, 2021

Respectfully submitted, /s/ Daniel P. Foster, Esquire Daniel P. Foster PA I.D. # 92376 Foster Law Offices 1210 Park Avenue Meadville, PA 16335

Phone: 814.724.1165 Fax: 814.724.1158

Email:dan@mrdebtbuster.com

Attorney for Debtors

CERTIFICATE OF SERVICE

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the NOTICE OF HEARING ALONG WITH DEBTOR'S MOTION TO AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR, by Certified Mail, U.S. Postage Paid on the parties below*.

Executed on: February 24, 2021 By: /s/ Kristen N. Dennis

Kristen N. Dennis, PARALEGAL FOSTER LAW OFFICES 1210 Park Avenue Meadville, PA 16335 Tel 814.724.1165 Fax 814.724.1158

MATRIX

Milford & Connie Rimer 202 Kennard Road Greenville, PA 16125

Ford Motor Credit Company C/O Jim Farley P.O. Box 6248, Dearborn, MI 48126

Burton Neil & Associates C/O Loyd Markind 1060 Andrew Drive, Suite 170 West Chester, PA 19380

Ronda J. Winnecour cmecf@chapter13trusteewdpa.com

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